

WANDA R. CLEMONS,

Plaintiff,

V.

CAROLYN W. COLVIN,
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:15-cv-00389-APG-VCF

COMES NOW Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (Defendant), by and through her counsel, Daniel G. Bogden, United States Attorney, and Sharon Lahey, Special Assistant United States Attorney, to request that this Court extend the time to respond to Plaintiff's Amended Motion for Remand, which was filed on July 13, 2015 by 30 days from August 12, 2015 to September 14, 2015. This is Defendant's first request for an extension of time to respond to Plaintiff's Motion. Counsel's colleague Marla Letellier contacted Plaintiff's counsel on August 10, 2015 and confirmed that Plaintiff does not oppose Defendant's motion. Defendants' current deadline is August 12, 2015.

1 The Commissioner regrettably makes this request because Counsel responsible for briefing
2 this case is unexpectedly out of the office due to medical issues. It is unclear at this time how long
3 Counsel will be out of the office. The Commissioner requests a thirty (30) day extension in order to
4 accommodate the potential need to transfer this case to new counsel.

5 Defendant therefore respectfully requests a thirty (30) day extension of time to respond to
6 Plaintiff's motion, up to and including September 14, 2015.

7 Dated: August 10, 2015.

8 Respectfully submitted

9 DANIEL G. BOGDEN
10 United States Attorney

11 /s/ Sharon Lahey
12 SHARON LAHEY
Special Assistant United States Attorney

13 OF COUNSEL:

14 DEBORAH STACHEL
15 Acting Regional Chief Counsel
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17 IT IS SO ORDERED:

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19 UNITED STATES MAGISTRATE JUDGE

20 DATED: August 14, 2015
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CERTIFICATE OF SERVICE

I, Sharon Lahey, certify that the following individual(s) were served with a copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date, and via the method of service, identified below:

CM/ECF:

Marc V. Kalagian
211 E. Ocean Blvd., Suite 420
Long Beach, CA 90802
Email: marc.kalagian@rksslaw.com

Leonard Stone
710 South 4th Street
Las Vegas, NV 89101
Email: lstone@shookandstone.com

Dated this 10th day of August, 2015

/s/ Sharon Lahey
SHARON LAHEY
Assistant United States Attorney